

**CALIFORNIA CIVIL RIGHTS LAW GROUP**

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Attorneys for Plaintiffs,  
DEMETRIC DI-AZ and OWEN DIAZ

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

DEMETRIC DI-AZ, OWEN DIAZ, and  
LAMAR PATTERSON,

Plaintiffs,

v.

TESLA, INC. dba TESLA MOTORS, INC.;  
CITISTAFF SOLUTIONS, INC.; WEST  
VALLEY STAFFING GROUP;  
CHARTWELL STAFFING SERVICES, INC.;  
and DOES 1-50, inclusive,

Defendants.

Case No. 3:17-cv-06748-WHO

**PLAINTIFFS' ADMINISTRATIVE  
MOTION TO FILE DOCUMENTS  
UNDER SEAL IN SUPPORT OF  
PLAINTIFFS' OPPOSITION TO  
DEFENDANT TESLA, INC.'S MOTION  
FOR PARTIAL SUMMARY JUDGMENT**

Date: December 18, 2019

Time: 2:00 p.m.

Courtroom: 2, 17th Floor

Judge: Hon. William H. Orrick

Trial Date: March 2, 2020

Complaint filed: October 16, 2017

**MOTION**

Pursuant to Local Rules 7-11 and 79-5, as well as Judge Orrick's Standing Order regarding administrative motions to seal, Plaintiffs Demetric Di-az and Owen Diaz respectfully request an order sealing the physical copies in the Court's files of Exhibits A through S to the Supplemental Declaration of Lawrence Organ in Support of Plaintiffs' Opposition to Defendant Tesla, Inc.'s Motion for Summary Judgment. This Motion is based on the Declaration of Lawrence Organ in support thereof, and the documents to be sealed are laid out below:

<b>Document</b>	<b>Designating Party</b>	<b>Basis for Sealing</b>
Exhibit A: NS000004	nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit B: Deposition of Plaintiff Owen Diaz	Tesla, Inc.; nextSource, Inc.; and Citistaff Solutions, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit C: Deposition of Plaintiff Demetric Di-az	Tesla, Inc. and Citistaff Solutions, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit D: TESLA-0000842 to TESLA-0000843	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit E: CITISTAFF-0000043	Citistaff Solutions, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit F: WV000100 to WV00012	West Valley Staffing Group	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit G: TESLA-0000510	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit H: TESLA-0000511	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit I: TESLA-0000314 to TESLA-0000316	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit J: TESLA-0000060	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit K: TESLA-0000626	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit L: NS000108	nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit M: NS000138 to NS0000139	nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit N: CITISTAFF-0000050 to CITISTAFF-0000055	Citistaff Solutions, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).

Exhibit O: NS000038-NS000045	nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit P: Deposition of Lamar Patterson	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit Q: NS000095 to NS000100	nextSource, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit R: TESLA0001003 to TESLA0001005	Tesla, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).
Exhibit S: CITISTAFF-0000001	Citistaff Solutions, Inc.	Marked confidential pursuant to Protective Order (Dkt. No. 50).

Publicizing these documents would violate the Protective Order entered in this case [Dkt. No. 50].

DATED: November 19, 2019

By:       /s Lawrence Organ        
 Lawrence A. Organ, Esq.  
 Navruz Avloni, Esq.  
 J. Bernard Alexander, Esq.  
 Attorneys for Plaintiffs  
 DEMETRIC DI-AZ AND OWEN DIAZ